

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**LINDA LOUISE CULKIN,**

**Defendant.**

**Criminal Case No. 12-CR-10080-GAO**

**JOINT INITIAL STATUS REPORT**

Pursuant to Local Rule 116.5, the parties have conferred and submit this joint initial status report:

1. The United States provided automatic discovery within the time provided by the local rules. Defendant has not made any additional discovery requests, but may do so after reviewing the automatic discovery.
2. The United States will work with Defendant to provide discovery in addition to that required by the local rules.
3. Defendant requires additional time to review the discovery and further meet with Defendant to evaluate whether and when to request additional discovery.
4. The United States has provided Defense counsel a proposed protective order that would restrict the dissemination of information concerning the victims. Defense counsel will discuss this with Defendant.
5. Defendant must review the discovery, meet further with Defendant, and review the case file before she can identify whether any pretrial motions will be necessary and on what

schedule they could be filed.

6. Because the parties are unclear on whether a trial will be necessary or which types of experts would be called, the parties ask to defer scheduling expert witness disclosures until a future status conference.

7. The parties believe that the Court has excluded all of the time through December 4, 2012, and ask the Court to exclude the time through the date of the next status conference.

8. The parties request that an interim status conference be scheduled in six weeks.

9. Defense counsel has had Defendant examined by a mental health expert so that she can evaluate whether further motions should be filed regarding Defendant's mental health and/or bail review. The mental health expert needs to meet with Defendant again in order to assist defense counsel with her recommendations. Defense counsel is investigating whether there are any alternative facilities or programs to give Defendant appropriate mental health treatment.

10. The United States has determined the location of some evidence required for trial that is being held by law enforcement officers in another country, and is beginning to draft an MLAT to obtain that evidence. The United States is also in the process of determining which witnesses from that country would be necessary witnesses at trial. The MLAT and letters rogatory may require a delay in setting a trial schedule.

Respectfully submitted,

Carmen M. Ortiz  
United States Attorney

Inga Parsons, Esq.

By: /s/ Scott L. Garland  
Scott L. Garland  
Assistant U.S. Attorney

/s/ Inga Parsons  
Inga Parsons  
Counsel for Defendant Culkin



CERTIFICATE OF SERVICE

I hereby certify that this document will be filed through the ECF system and therefore will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Scott L. Garland

Scott L. Garland  
Assistant United States Attorney

Date: November 27, 2012